

BAKER BOTTS L.L.P.

Brian C. Kerr
30 Rockefeller Plaza
New York, NY 10112-4498
Tel: (212) 408-2543
Fax: (212) 259-2543

David D. Sterling (admitted *pro hac vice*)
Amy Pharr Hefley (admitted *pro hac vice*)
910 Louisiana
Houston, TX 77002
Telephone: (713) 229-1946
Fax: (713) 229-7946

*Counsel for Defendants
Chicago Bridge & Iron Company N.V.,
Philip Asherman, Ron Ballschmiede and
Westley Stockton*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE CHICAGO BRIDGE & IRON
COMPANY N.V. SECURITIES
LITIGATION) CASE NO. 1:17-CV-1580
)
) Hon. Lorna Schofield

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS'
MOTION IN LIMINE NO. 10**

Defendants Chicago Bridge & Iron Co. N.V. (“CB&I”), Philip K. Asherman, Ronald A. Ballschmiede, and Westley S. Stockton submit this Memorandum of Law in support of their Motion *in Limine* No. 10 to preclude any argument or questioning that seeks to or tends to arouse prejudice against Defendants merely because Defendant CB&I is a corporation.

Any such remarks would be irrelevant and calculated to prejudice Defendants unfairly. FED. R. EVID. 402, 403. The sustaining of this *in limine* shall not prevent Defendants from inquiring into possible bias against Defendants or corporations in general during voir dire.

Dated: December 13, 2021

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ David D. Sterling

Brian C. Kerr
30 Rockefeller Plaza
New York, NY 10112-4498
Tel: (212) 408-2543
Fax: (212) 259-2543
brian.kerr@bakerbotts.com

David D. Sterling (admitted *pro hac vice*)
Texas Bar No. 19170000
Amy Pharr Hefley (admitted *pro hac vice*)
Texas Bar No. 24046046
910 Louisiana St.
Houston, Texas 77002
Tel: (713) 229-1946
Fax: (713) 229-7946
david.sterling@bakerbotts.com
amy.hefley@bakerbotts.com

COUNSEL FOR DEFENDANTS